

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Virginia

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Criminal No. 1:18 CR 83

The Honorable T.S. Ellis, III

STIPULATION REGARDING ORIENTAL RUG PURCHASES

The parties stipulate to the following facts:

1. Joshua Nabatkhorian is an owner of J&J Oriental Rug Gallery, which sells and repairs oriental rugs, and is located in Alexandria, Virginia.
2. On March 19, 2010, J&J Oriental Rug Gallery submitted to Paul J. Manafort, Jr., invoice 25819 in the amount of \$160,000 for two silk rugs.
3. On March 31, 2010, a wire transfer from Yiakora Ventures Limited in the amount of \$140,000 drawn on a bank account at the Bank of Cyprus in Nicosia, Cyprus was sent to J&J Oriental Rug Gallery.
4. On June 10, 2010, J&J Oriental Rug Gallery and Jesand Investment Corporation, through Mr. Manafort, entered into a loan agreement. Jesand Investment Corporation agreed to loan J&J Oriental Rug Gallery \$250,000 for investment in oriental rugs in exchange for 40% of the profit on any sale of rugs and \$500,000 of oriental rugs as collateral.

5. On June 16, 2010, a wire transfer from Global Highway Limited in the amount of \$250,000 drawn on a bank account at Marfin Laiki Bank in Nicosia, Cyprus was sent to J&J Oriental Rug Gallery.

6. In or around February 2012, Nabatkhorian called Mr. Manafort to request that Mr. Manafort pay all of his outstanding invoices with J&J Oriental Rug Gallery. Mr. Manafort offered \$100,000 as payment in full for all outstanding invoices, which Nabatkhorian accepted.

7. On February 28, 2012, a wire transfer from Global Highway Limited in the amount of \$100,000 drawn on a bank account at Marfin Laiki Bank in Nicosia, Cyprus was sent to Natalie Nabatkhorian, who is Nabatkhorian's wife.

8. The records attached to this stipulation as Exhibits A through B are records of J&J Oriental Rug Gallery and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

- a. Exhibit A is a copy of invoice 25819 in the amount of \$160,000 for two silk rugs.
- b. Exhibit B is a copy of the loan agreement dated June 10, 2010.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By:



Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By:



Andrew Weissmann
Greg D. Andres
Brandon L. Van Grack
Special Assistant United States Attorneys
Uzo Asonye
Assistant United States Attorney